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STATE OF COLORADO

Bill Owens Governor
Douglas H. Benevento, Executive Director

Dedicated to protecting and improving the health and environment of the people of Colorado

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April 30, 2004

Mr. Joe Legare

Acting Assistant Manager for Environment and Stewardship

U.S. Department of Energy, Rocky Flats Project Office

10808 Highway 93, Unit A

Golden, CO 80403-8200

RE Closeout Strategy for the Sanitary Sewer System - Comments

Dear Mr. Legare

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division has reviewed the Draft Closure Strategy for the Sanitary Sewer System dated March 30, 2004 and received on April 7, 2004. Our concerns have been discussed with site personnel, specifically at the ER Resolution Meeting on April 29th and previously in discussions with Annette Primrose. Most importantly, we do not concur or approve of a No Further Accelerated Action (NTAA) determination for the Sanitary Sewer System. However, our specific comments are as follows:

1. This document requests our approval of No Further Accelerated Action (NFAA) for the Sanitary Sewer System PAC 000-500, which is a part of THSS Group 000-3. We believe it is too early in the investigation and possible remediation process to agree to NFAA for the sanitary sewer system at this time. Additional sediment/sludge samples have been requested, and as buildings are removed associated contamination has been, and may be, found in the sanitary sewers that may require additional investigation and possible remediation by ER in areas outside of the building footprint. In addition, our influent sampling (to the WWTF) has identified elevated levels of transuranics, the source of which still needs to be determined. As such, we do not agree that an NFAA is appropriate at this time.
2. Figure 1 needs to be modified, or another figure provided, to properly identify or differentiate the Manholes or Manways, cleanouts, and other parts of the sanitary sewer system that are currently shown as large dots.
3. Section 2.4 - Page 8 4th & 5th paragraphs - Although the discussion would possibly infer that there shouldn't be any significant amount of precipitates or sources in the sanitary sewer system, this can not be specifically determined as fact without additional sampling and examination of the system. As such, only after sampling is performed and the sewer lines have been appropriately examined during the proposed D&D and ER activities, can any conclusion be properly determined.
4. Section 3.0 - The statements contained in this section that indicate that there is no significant contamination associated with or adjacent to the sewer lines, nor that there will be any future ground water or surface water impacts from this system, can not be verified at this time, and should be modified to reflect the limitation of current information. In addition, although the lines may be disrupted so that flow through them will not occur, they are not "isolated" any more than the soil. Considering that the sewer lines are known to leak, with groundwater flowing into and out of them, any contamination that may be in them will be available for transport in the groundwater.
5. Section 3.1.1 - The discussion of contaminants includes uranium, lead and benzo(a)pyrene. However, it is indicated in Table 4 that Chromium VI also exceeds the WRW AIs, and should also be discussed. Please include or correct as appropriate.
6. Sections 3.2 through 3.2.4 - The discussion in these sections should be modified to recognize the effect of dilution to possibly reduce the levels of contamination that might reside in the sewer lines. The management of the Biosolid as a LLW should also be discussed.

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DIETER T J		
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FERRERA D W	X	
GIACOMINI J J		
LINDSAY D C	X	
LONG J W		
LYLE J L		
MARTINEZ L A	X	
NAGEL R E	X	
NESTA S	X	
NORTH K	X	
PARKER A M		
RODGERS A D		
SHELTON D C	X	
SPEARS M S	X	
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TOBIN M	X	
TUOR N R		
WEMELT K	X	
WILLIAMS J L		
ZAHM C	X	

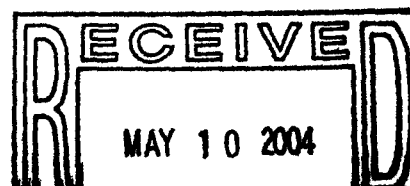
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ADMIN RECORD	X
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Reviewed for Addressee
Corres. Control RFP

Date By

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ADMIN RECORD

IA-A-002101

- 7 Section 3 3 – The discussion in this section addresses copper, zinc, and acetone. However, Mercury is also identified in Table B-2 as being above Surface Water Standards, and should be discussed. Recent influent sampling has also identified Transuranics exceeding the Surface Water Standards, which should also be recognized in this discussion.
- 8 Section 4 1 – It is stated that the equipment used during the jetting of the lines was not radiologically contaminated, “indicating that significant levels of radioactivity are not present in the main system.” Unfortunately this conclusion is only potentially relevant to possible removable contamination in the lines traversed by this equipment and does not address possible fixed contamination. Nor does it address later contamination that may have come into the “main Line.” Other statements and conclusions in this section need to be properly modified as discussed in other comments.
- 9 Section 4 2 – Due to the increased levels of flushing that are occurring, the proposed sample locations as identified on Figure 1 should be collected as soon as possible, starting from the east to the west. In addition, additional samples need to be collected from the lines that are indicated not to have been flushed at B883, B371/374, and the effluent feedback at B974. The samples should be collected from these locations if possible, or from appropriate nearby locations if there is no sludge/sediment to sample. Considering the previous and current flushing of this system, it is recommended that an inspection of the manholes should be performed to identify possible sewer contents and samples collected as appropriate. All sediment/sludge samples should also be sampled for metals as well as Rads. Also, there are several unflushed sewer lines on Figure 1 that appear to lead nowhere that need to be investigated, explained, and possibly sampled.
- 10 Section 4 2 1 – The proposed effort to inject grout beneath the manholes does not appear to provide an effective barrier to groundwater flow in the utility trench around the sewer line or manhole. As such, we recommend a complete disruption of the utility trenches by excavation and grout placement or other appropriate means to disrupt the preferential pathway created by the utility trenches in the area north of B865 & 886 along Central Avenue and in the 700 area around B707, 750, 778, and 776/777. This is especially a concern with the potential for east-west groundwater migration through this area of thin alluvium and bedrock high.
- 11 Section 4 2 1 – The proposed sequence for plugging the manholes should be changed from, 1) plugging the inlet and outlet, 2) demo top three feet and put in hole, 3) put in grout to cover inlet & outlet, 4) then backfill remainder with grout or soil to final grade, to 1) plug inlet and outlet, 2) put in grout to cover inlet and outlet, 3) demo upper three feet and put in hole, 4) fill remainder with grout or soil. Also, radiological surveys need to be performed prior to plugging the inlet and outlet, to include the interior of the manhole in areas down gradient from potential radiological contamination sources/buildings.
- 12 Section 4 2 3 – As discussed in these comments and in our October 6, 2003 letter regarding our non-concurrence of the RLCR for the sanitary sewer structures, additional information needs to be provided to properly characterize the WWT.
- 13 Section 4 2 4 – For the abandoned lines, if there are no remaining manholes to enter and disrupt the lines, then these should be excavated, disrupted, plugged and sampled as appropriate.
- 14 Section 5 0 – Please see above comments for our concerns with this section.

If you have any questions regarding this correspondence please contact me at (303) 692-3367, David Kruchek at (303) 692-3328, or Edgar Ethington at (303) 692-3438.

Sincerely,



Steven H. Gunderson
RFCA Project Coordinator

cc Norma Castaneda, DOE
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Steve Nesta, KH

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Administrative Records Building T130G